

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
Norfolk Division**

**IN RE: TRENTON O'NEAL DANIEL
PAMELA SUZETTE DANIEL
Debtors.**

**Case No. 18-70819-SCS
Chapter 13**

NOTICE OF MOTION

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to grant the relief sought in the motion, or if you want the court to consider your views on the motion, then, on or before fourteen (14) days from the date of this notice, you or your attorney must:

 x File with the Court, at the address shown below, a written request for a hearing (or a written response pursuant Local Bankruptcy Rule 9013-1 (H)). If you mail your request for a hearing (or response) to the Court for filing, you must mail it early enough so the court will receive it on or before the date stated above.

Clerk of Court
United States Bankruptcy Court
600 Granby Street
Norfolk, VA 23510

You must also mail a copy to:

Timothy R. Douglass, Esq.
John W. Lee, P.C.
291 Independence Blvd., Ste 530
Virginia Beach, VA 23462

 Attend a hearing to be scheduled at a later date. You will receive separate notice of hearing. If no timely response has been filed opposing the relief requested the court may grant the relief without holding a hearing.

_____ Attend the hearing scheduled on the Motion (or objection) to be held on
_____ at _____ a.m./ p.m. at the United States Bankruptcy Court
_____.

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion or objection and enter an order granting that relief.

Counsel For:

TRENTON O'NEAL DANIEL
PAMELA SUZETTE DANIEL

10/31/2018
Date

/s/ Timothy R. Douglass
Timothy R. Douglass, Esq.
VSB 72901
John W. Lee, P.C.
291 Independence Blvd., Ste. 530
Virginia Beach, VA 23462
757-961-8553
Fax: 757-961-3488
Counsel for the Debtor

Certificate of Service

I hereby certify that I mailed a true and accurate copy of the foregoing to the Trustee, the US Trustee, the debtor, and all creditors listed on the attached List of Service, pursuant to Rule 7004 of the Federal Rules of Bankruptcy procedure, on this 31st day of October 2018.

/s/ Timothy R. Douglass
Timothy R. Douglass, Esq.

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
Norfolk Division**

**IN RE: TRENTON O'NEAL DANIEL
PAMELA SUZETTE DANIEL**

Case No. 18-70819-SCS

Debtor.

Chapter 13

MOTION TO DISMISS CHAPTER 13 CASE BY DEBTORS

COME NOW the Debtors, Trenton O'Neal Daniel and Pamela Suzette Daniel, and hereby move to voluntarily dismiss their Chapter 13 Case without prejudice pursuant to Section 1307 (b) on the following grounds:

1. That on March 12, 2018, the debtors filed a petition under Chapter 13 in the Eastern District of Virginia, Norfolk Division.
2. That on April 20, 2018, the debtors filed an Amended Chapter 13 Plan that was confirmed by the Court on June 12, 2018.
3. That the debtors no longer wish to proceed with their Chapter 13 Bankruptcy Case and they wish for their case to be dismissed.

Timothy R. Douglass, Esquire (VSB 72901)
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Attorney for Debtor

WHEREFORE, pursuant to Section 1307 (b), the debtors move for a Voluntary Dismissal of their Chapter 13 Case, without prejudice and for such other and further relief as this Court may deem proper.

**TRENTON O'NEAL DANIEL
PAMELA SUZETTE DANIEL**

/s/ Timothy R. Douglass
Timothy R. Douglass, Esq.
VSB 72901
John W. Lee, P.C.
291 Independence Blvd., Ste. 530
Virginia Beach, VA 23462
757-961-8553
Fax: 757-961-3488
Counsel for the Debtor

Certificate of Service

I hereby certify that I mailed a true and accurate copy of the foregoing to the Chapter 13 Trustee, U.S. Trustee, the debtor, and all creditors listed on the attached List of Service on this 31st day of October 2018.

/s/ Timothy R. Douglass
Timothy R. Douglass, Esq